UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
INDUSTRIAL ENVIRONMENTAL RESEARCH LABORATORY
RESEARCH TRIANGLE PARK
NORTH CAROLINA 27711

DATE: May 22, 1980

SUBJECT: Clarification of 0.55 lbs/10^6 NO_x Limit for Intermountain Power Project (IPP)

FROM: David G. Lachapelle DGL
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TO: Norm Huey, Chief
Technical Support Section, 8AH-A
Region VIII, Denver, Colorado

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The purpose of this memo is to provide clarification to our memo of 4/21/80 relative to the BACT NO_x emission limit for the Intermountain power project. In that memo we stated that a NO_x emission limit of 0.55 lbs/10^6 Btu is "probably" achievable. That limit was qualified for the following reasons:

- The emission data cited was based solely on tests conducted on Utah Power and Light Company's Huntington Canyon No. 2 unit. This is a tangentially fired boiler built by Combustion Engineering, Inc.
- We have no emission performance data from units built by the other three utility boiler manufacturers (Babcock & Wilcox, Foster Wheeler, and Riley Stoker) burning the same Utah "B" bituminous coal.
- We do not know who will be selected as the boiler manufacturer(s) for the IPP units.

Despite these factors, we feel that a NO_x limit of 0.55 lbs/10^6 Btu on a 30-day rolling average basis can be achieved with state-of-the-art burner and furnace design by any of these utility boiler manufacturers with the coal proposed for IPP. Our Summary statement in the 4/21/80 memo made no attempt to qualify the 0.55 lbs/10^6 Btu limit. Consequently, we have no objection to deleting the word "probably" as it relates to that limit.

cc: Walter C. Barber, OAQPS (MD-10)
John Burchard, IERL (MD-60)

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